



301333

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MEMORANDUM

TO: Ms. Sharon Newlon REF. NO.: 042192-03

FROM: Garth Daley/ko/118 DATE: September 27, 2007

C.C.: RRG/Clayton Site Technical Committee
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: Status Report # 23 for the Resource Recovery Group/Clayton Chemical Company Site

This Status Report is being submitted to the United States Environmental Protection Agency (U.S. EPA) and its designated Federal On-Scene Coordinator (OSC) Kevin Turner in accordance with Section VIII, Condition 19.a. of the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the Resource Recovery Group/Clayton Chemical Soils (RRG/Clayton) Site dated October 28, 2005. The reporting period for this twenty-third Monthly Status Report is August 27, 2007, through September 21, 2007.

EFFECTIVE DATE

On November 1, 2005, Ms. Sharon Newlon, the acting counsel for the RRG/Clayton Site Potentially Responsible Party Group (The Respondents), received the AOC. In accordance with Section XXVIII, Condition 76 of the AOC, this date represented the Effective Date for the AOC and started the compliance time clock for the Removal Action. Status Report # 22 was submitted to U.S. EPA on August 31, 2007.

Please note that the weeks of August 6 - 10, 2007, August 13 - 17, 2007 and August 20 - 24, 2007 were incorrectly reported as being weeks # 89 through 91 in the respective Weekly Summaries included with Status Report # 22. Those time periods should have been weeks # 88 through 90, respectively.

During a review of the project file, errors were noted in Status Report #5 (submitted to U.S. EPA on March 31, 2006). These errors are related to an incorrect sample date being given for the waste characterization samples collected from the contents of tank 13 and stockpiled concrete debris generated during the demolition of the tank farm walls across the Site. As presented in paragraph 3 of Section 1.2 of the report and on the separations sheets for Appendices F and G of the report, the samples in question were collected on March 2, 2006. However, as presented in the Weekly Summary for week of February 27 - March 3, 2006 (Appendix A of the report) and the provided analytical reports, the correct sample collection date are March 3, 2006. It should be noted that the collection of the concrete sample was not discussed in the Weekly Summary report.

1.0 COMPLETED ACTIVITIES**1.1 PRE-MOBILIZATION, MOBILIZATION AND
REMOVAL ACTIVITIES COMPLETED TO DATE**

Activities performed during the reporting period were primarily related to the submission of Status Report # 22, and performing miscellaneous administrative tasks related to the project documents and records generated to date. Additional details of the completed tasks are provided for review in this report, as well as in select attachments to this report.

A weekly summary of activities appears below:

- During the week of August 27, 2007 (August 27 – August 31, 2007), the primary activities that were performed centered on the development of Status Report # 22. No Site visits were initiated during the week of August 27, 2007;
- The key activity completed during the week of September 3, 2007 involved the review and organization of various project documents that have been compiled and/or generated during the completion of on-Site activities. No Site visits were initiated during the week of September 3, 2007;
- For the week of September 10, 2007, the primary focus of Site-related activities was the continued review and organization of project records and documents; and
- The continued review and assembly of the various documents generated during the completion of the on-Site activities was the focus of Site-related actions performed during the week of September 17, 2007. No Site visits were scheduled or completed during the week.

Additional details of the completed activities, including Site maps, are provided in the form of the Weekly Summary Reports that are included as Appendices to this report. Those reports are presented as follows: Appendix A – Weekly Summary of Site Activities for August 27 – 31, 2007; Appendix B – Weekly Summary of Site Activities for September 3 – 7, 2007; Appendix C – Weekly Summary of Site Activities for September 10 – 14, 2007; and Appendix D – Weekly Summary of Site Activities for September 17 – 21, 2007.

1.2 SAMPLING AND ANALYSIS

Severn Trent Laboratories (STL) of St. Louis, Missouri replaced RTI Laboratories of Livonia, Michigan (RTI) as the laboratory of record for the Removal Action under request by The Respondents. This request was approved by OSC Turner on April 20, 2006. However, TEK-Lab, Inc. of Collinsville, Illinois (TEK-Lab) has been used for the performance of waste characterization sample analysis to assist with/complete waste disposal activities.

No samples were collected during the reporting period. Also, no analytical data from previously collected samples were received during the reporting period.

1.3 REMOVAL ACTION WORK

Several actions have been undertaken towards completing the Removal Action at the RRG/Clayton Chemical Site during the reporting period. An outline of the completed actions was discussed above in Section 1.1 of this report. Additional details of the activities performed are presented in the Weekly Activity Summaries included as Appendices A through D of this report.

2.0 ENCOUNTERED PROBLEMS, RESOLUTIONS, AND ANTICIPATED PROBLEMS

No significant technical problems were encountered during the reporting period. Similarly, no technical problems or issues are anticipated for the upcoming period.

3.0 ANALYTICAL DATA GENERATED/RECEIVED

As stated in Section 1.2, no analytical data were received during the reporting period.

4.0 ANTICIPATED ACTIVITIES FOR UPCOMING REPORT PERIOD**4.1 SITE PLANS**

During the upcoming reporting period (September 24, 2007, through October 26, 2007), the following activities are anticipated:

- Oversight of the second round of groundwater sampling from the Sauget Area 2 well cluster located along the western Site boundary;
- Removal for the remaining wood waste roll off container will/may be scheduled;
- Miscellaneous Site cleanup activities will be completed, as needed, based on the progress of the activities discussed above and weather conditions; and
- Site restoration activities will be completed, as needed.

4.2 SAMPLING AND ANALYSIS

The Sauget Area 2 Group has requested and received Site access approval to collect a second round of groundwater samples from the RRG/Clayton Site during the upcoming report period. Once a mutually convenient date has been determined, sample collection will be completed for the 3 groundwater monitoring wells that were installed along the western boundary of the Site in June 2006. CRA will provide oversight of this sampling event on behalf of The Respondents, as well as collect sample splits.

4.3 REMOVAL ACTION WORK

Among the activities expected to be performed and/or completed during the upcoming report period are the removal of wood waste from the Site for disposal at the Milam Landfill facility in East St. Louis, Illinois and limited Site restoration activities. An anticipated schedule for these activities appears below.

5.0 ANTICIPATED SCHEDULE

<i>Activity</i>	<i>Duration</i>	<i>Expected Start Date</i>
Continue Stormwater Control Measures	As needed/ongoing	September 24, 2007
Continue Technical Design and Construction Scheduling of Profile of the Landfill Cap	Ongoing/30 days	September 24, 2007
Initiate Wood Waste Removal Activities	Ongoing/30 days	September 24, 2007
Initiate Site Restoration Activities	Ongoing/30 days	September 24, 2007
Submit Status Report # 24	1 day	October 31, 2007

Attachments

FIGURE 1

SITE MAP

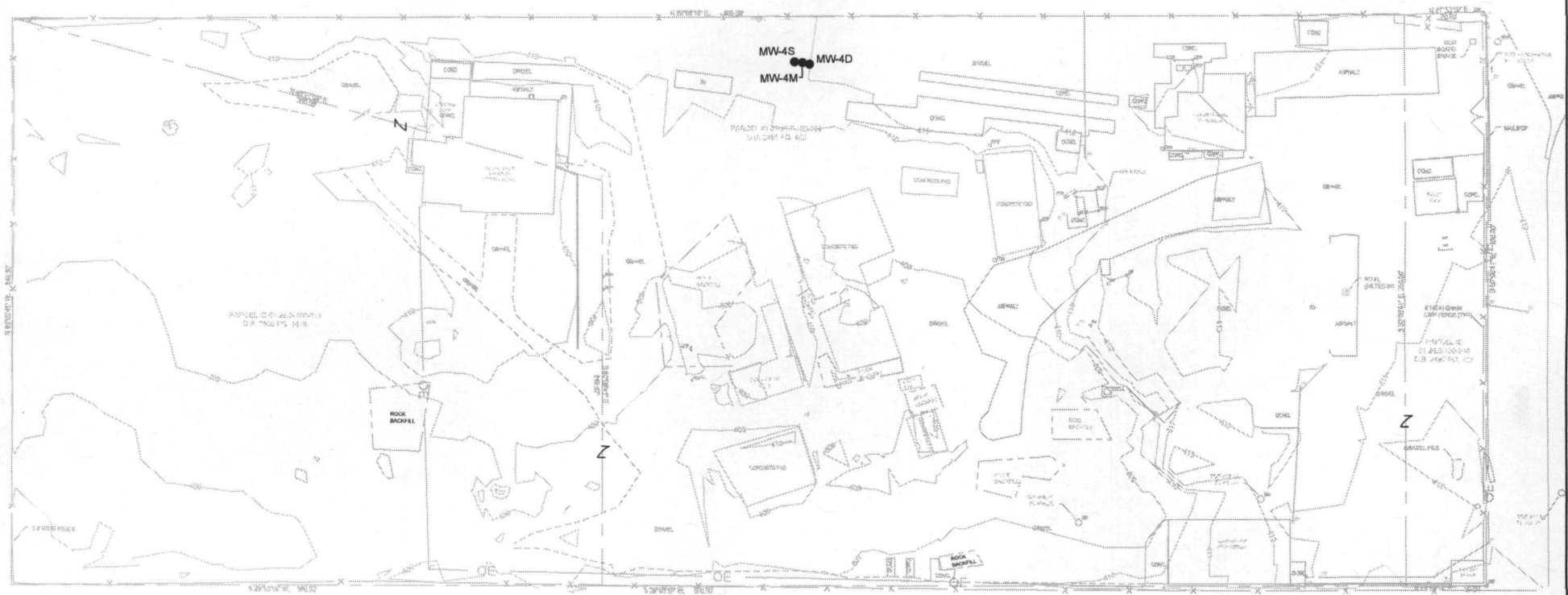


figure 1

CURRENT SITE CONDITIONS
RRG/CLAYTON CHEMICAL
Sauget, Illinois



APPENDIX A

WEEKLY SUMMARY OF SITE ACTIVITIES FOR AUGUST 27 – 31, 2007



**CONESTOGA-ROVERS
& ASSOCIATES**

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MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/114 DATE: September 27, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: Weekly Summary Of Site Activities For August 27 -31, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the ninety-first week (the period August 27 through 31, 2007) is presented below.

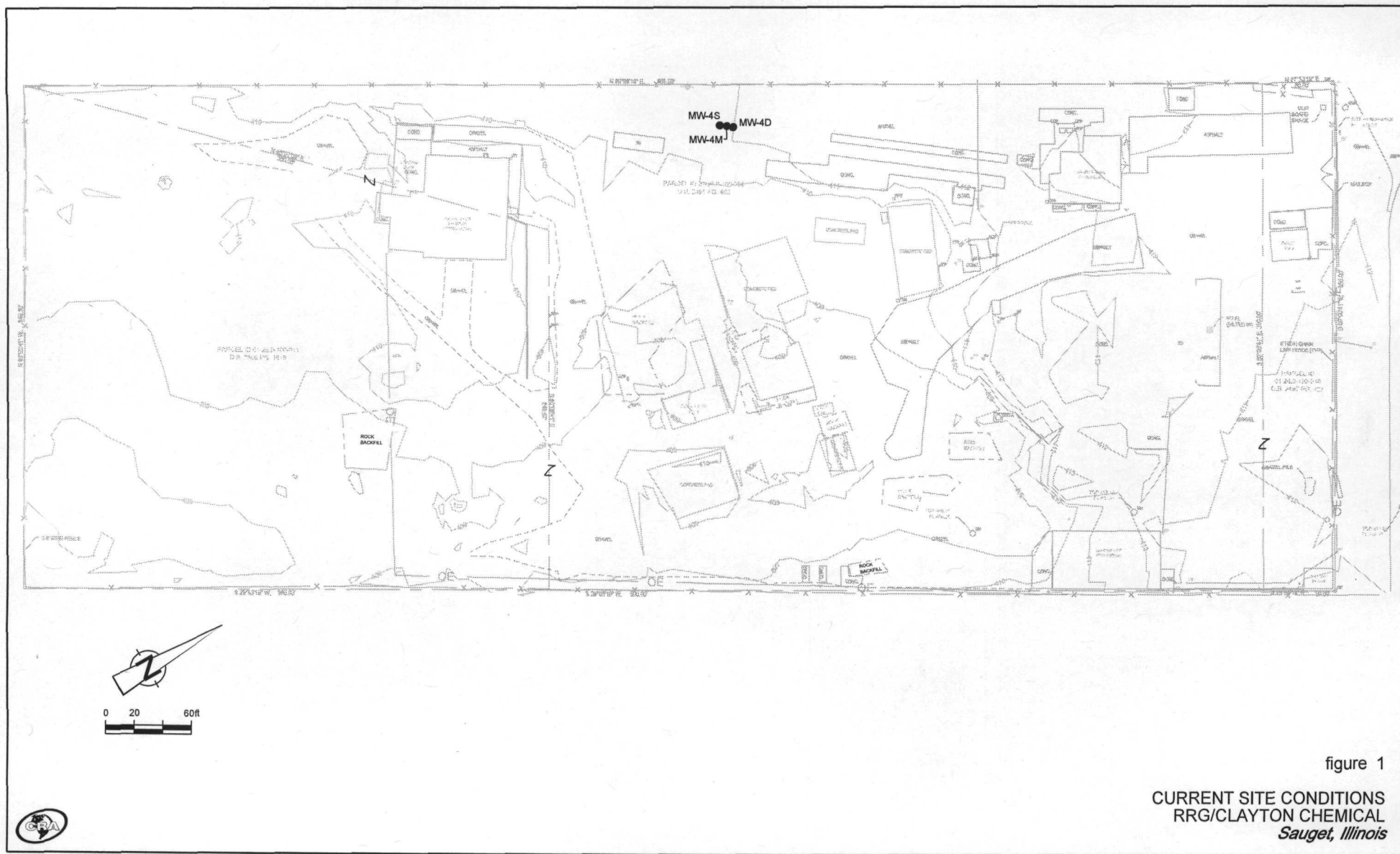
<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
August 27, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. The Respondents began development of the monthly Status Report
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
August 28, 2007	Mobilization Activities	No activity

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
August 28, 2007	Project Coordination	No on Site START presence due to no scheduled on Site activities. The Respondents continued development of the monthly Status Report
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
August 29, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. The Respondents continued development of the monthly Status Report
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
August 30, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. The Respondents continued development of the monthly Status Report
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
August 30, 2007	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
August 31, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. The Respondents submitted Status Report # 22 to U.S. EPA/OSC Turner
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment



APPENDIX B

WEEKLY SUMMARY OF SITE ACTIVITIES FOR SEPTEMBER 3 – 7, 2007



**CONESTOGA-ROVERS
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
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MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/115 DATE: September 27, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: Weekly Summary Of Site Activities For September 3 - 7, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the ninety-second week (the period September 3 through 7, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
September 3, 2007	Mobilization Activities	No activity - Labor Day Holiday
	Project Coordination	No activity - Labor Day Holiday
	Site Preparation	No activity - Labor Day Holiday
	Asbestos Abatement	No activity - Labor Day Holiday
	AST Sampling/Cleaning Removal	No activity - Labor Day Holiday
	Drum Characterization/Disposal	No activity - Labor Day Holiday
	Piping Draining/Disconnection	No activity - Labor Day Holiday
	Process Equipment Decommissioning	No activity - Labor Day Holiday
	Soil Sampling/Excavation	No activity - Labor Day Holiday
	Miscellaneous	No activity - Labor Day Holiday
September 4, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. The Respondents contacted START Bob Hill to report project status update
	Site Preparation	No on Site activity

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
September 4, 2007	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
September 5, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
September 6, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. The Respondents were informed via electronic mail of the resignation of Bob Hill and the subsequent assignment of Tom Binz as the designated project START. The Respondents subsequently contacted START Binz via telephone
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
September 6, 2007	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
September 7, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment

APPENDIX C

WEEKLY SUMMARY OF SITE ACTIVITIES FOR SEPTEMBER 10 - 14, 2007



**CONESTOGA-ROVERS
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www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/116 DATE: September 27, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: Weekly Summary Of Site Activities For September 10 - 14, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the ninety-third week (the period September 10 through 14, 2007) is presented below.

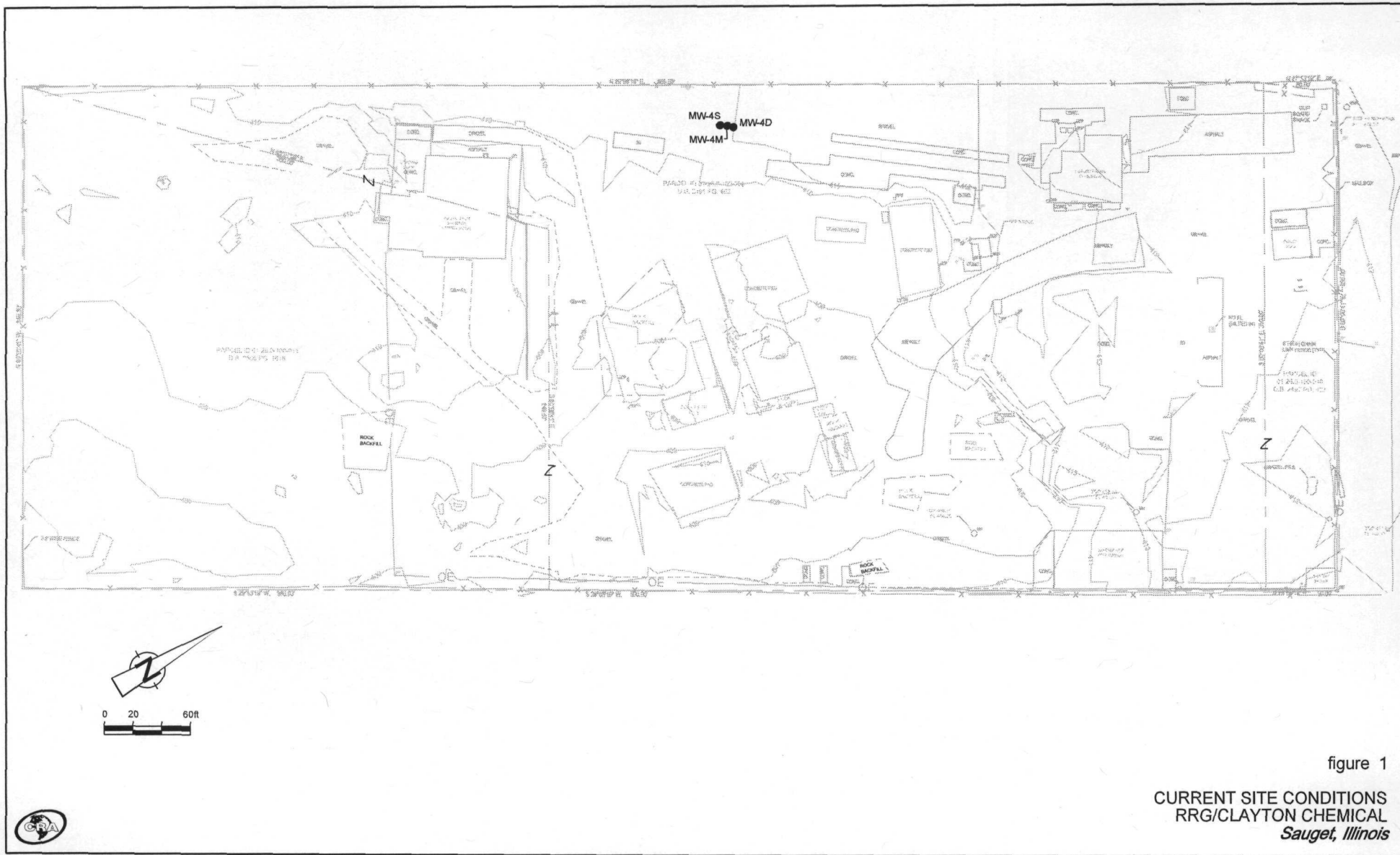
<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
September 10, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. The Respondents contacted START Binz via telephone to follow up on the recent project staffing change
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
September 11, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
September 12, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
September 13, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
September 13, 2007	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
September 14, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment



APPENDIX D

WEEKLY SUMMARY OF SITE ACTIVITIES FOR SEPTEMBER 17 - 21, 2007



**CONESTOGA-ROVERS
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8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
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www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/117 DATE: September 27, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: Weekly Summary Of Site Activities For September 17 - 21, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the ninety-fourth week (the period September 17 through 21, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
September 17, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
September 18, 2007	Mobilization Activities	No activity

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
September 18, 2007	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
September 19, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
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	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
September 20, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
September 20, 2007	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
September 21, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment

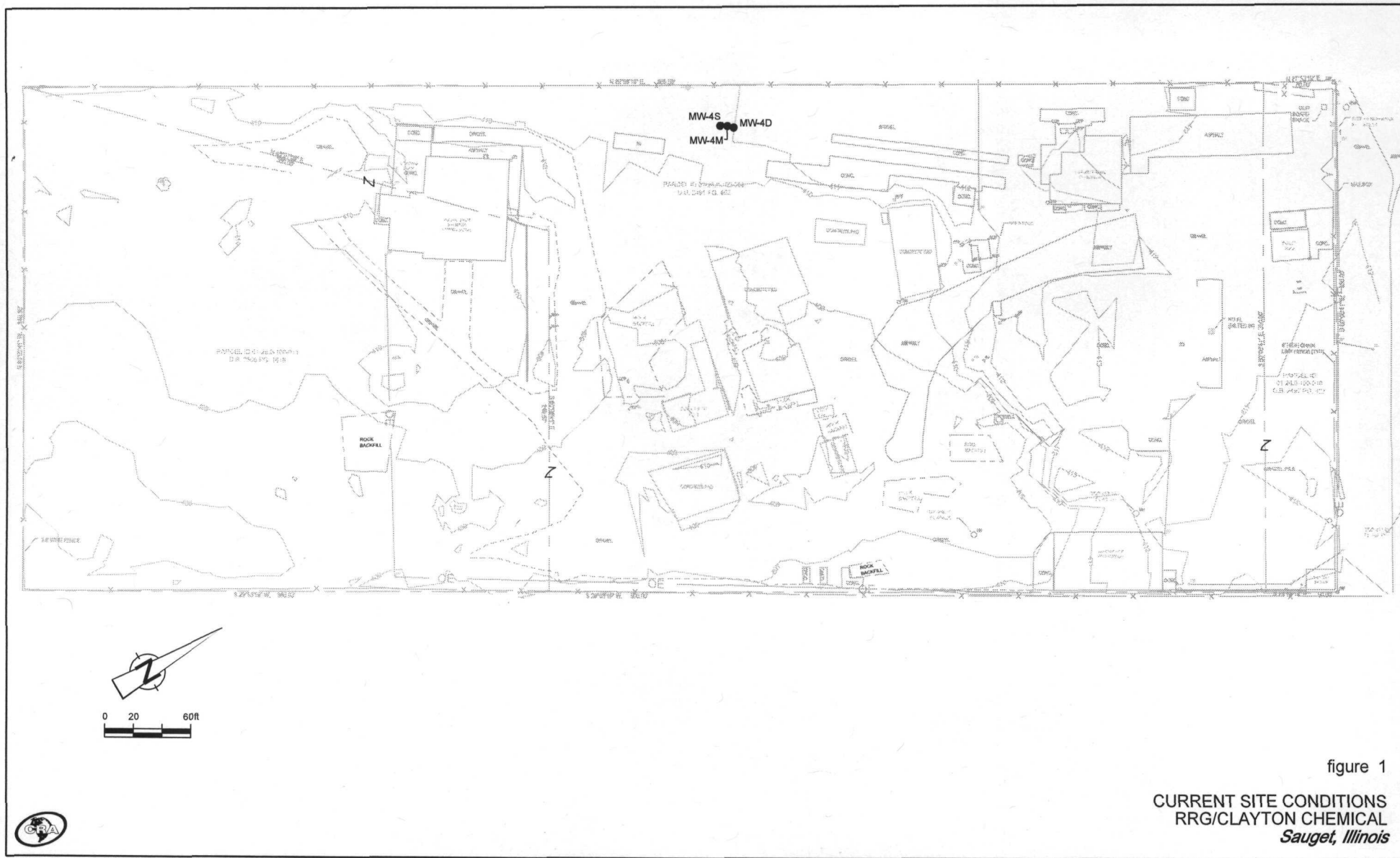


figure 1

CURRENT SITE CONDITIONS
RRG/CLAYTON CHEMICAL
Sauget, Illinois